IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA, Plaintiff.

CIVIL NO: 12-2039 (GAG)

v.

COMMONWEALTH OF PUERTO RICO, et al., Defendants.

**MOTION TO RESTRICT** 

TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and Puerto Rico Police Department, by and through the undersigned counsel, and move the Court for leave to file their Motion for Reconsideration of the Court's Restricted Orders as a selected parties document, as it contains sensitive information regarding the reform process which outweighs the presumption of public access to court documents and because it is filed in response to an Order filed with the same restriction requested herein.

WHEREFORE, Defendant respectfully requests the Court GRANT the instant motion to restrict.

**RESPECTFULLY SUBMITTED** in San Juan, Puerto Rico, this 15th day of January, 2019.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

> s / Javier Micheo Marcial USDC-PR No. 305310 ifmm@mcvpr.com

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